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8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 BANK OF AMERICA, N.A.,

11 Plaintiff,

12 vs.

13 FIDELITY NATIONAL TITLE GROUP,  
14 INC., CHICAGO TITLE INSURANCE  
15 COMPANY; TICOR TITLE OF NEVADA,  
16 INC.,

Defendants.

Case No.: 3:20-cv-00046-MMD-CSD

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE AMENDED  
COMPLAINT**

**(First Request)**

17 Plaintiff, Bank of America, N.A. ("BANA"), and Defendants, Fidelity National Title  
18 Group, Inc. ("Fidelity"); Chicago Title Insurance Company ("Chicago Title"); and Ticor Title of  
19 Nevada, Inc. ("Ticor") (collectively, the "Defendants" and with BANA, the "Parties"), hereby  
20 submit the following Stipulation to Extend Time to File Amended Complaint and to set  
21 Defendants' response deadline. The Parties, by and through their undersigned counsel, stipulate  
22 and agree as follows:

23 1. On July 9, 2020, BANA filed its Amended Complaint against Defendants [ECF  
24 No. 24];

25 2. Thereafter, on December 23, 2020, the Court ordered that the instant action be  
26 stayed pending the appeal in *Wells Fargo Bank, N.A. v. Fidelity National Title Ins. Co.*, Ninth  
27 Cir. Case No. 19-17332 (District Court Case No. 3:19-cv-00241-MMD-WGZ) ("*Wells Fargo*")  
28 [ECF No. 61];

1           3.           On November 29, 2021, the Ninth Circuit issued its mandate in *Wells Fargo*;

2           4.           On September 26, 2022, this Court issued its Order lifting the stay and ordered the  
3 Parties to submit a joint motion proposing a schedule through final resolution of this case within  
4 14 days of the Court's Order [ECF No. 65];

5           5.           On October 10, 2022, the Parties entered into a Stipulation to Amend Complaint  
6 and Continue Deadline to File Joint Proposed Discovery Plan [ECF No. 66] (the "Stipulation to  
7 Amend"), wherein the Parties agreed BANA would file an Amended Complaint within 30 days  
8 of the entry of the Court's Order on the Stipulation to Amend;

9           6.           On October 11, 2022, the Court's Order on the Stipulation to Amend was entered  
10 [ECF No. 68];

11           7.           BANA's deadline to file its Amended Complaint is currently November 10, 2022;

12           8.           BANA has conferred with Defendants and requested an extension of seven days  
13 to November 17, 2022, to file its Amended Complaint because Plaintiff's counsel has been out of  
14 town;

15           9.           Defendants do not object to the requested extension;

16           10.          The Parties hereby agree that BANA shall have an additional seven (7) days up to  
17 and including November 17, 2022 to file its Amended Complaint; and

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**IT IS SO STIPULATED.**

DATED this 8<sup>th</sup> day of November, 2022.

SINCLAIR BRAUN LLP

/s/ *Kevin S. Sinclair, Esq.*

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Dated this 9th day of November, 2022.

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